



January 25, 2013.

---

- b. Describe the discovery, if any, that will be necessary to the resolution of issues relating to jurisdiction and venue:

N/A

---

- c. Recommended date for filing motions addressing jurisdiction and venue:

Plaintiff's response is due on January 25, 2013.

---

**5. Amendments to Pleadings and/or Joinder of Parties**

- a. Recommended cut-off date for filing any motion to amend the pleadings and/or to add additional parties: N/A

- b. (if class action) Recommended date for filing motion to certify the class:  
N/A
- 

**6. Recommended Discovery Plan:**

- a. Describe the subjects on which discovery is to be sought and the nature and extent of discovery that each party will need:  
Plaintiff has asserted claims of national origin discrimination (O.R.C. 4112), race discrimination (O.R.C. 4112) and Breach of Contract. Defendant disputes liability and damages as to all of these claims. Written discovery shall be exchanged regarding the allegations made in the Complaint. Depositions of the Plaintiff and of General Products personnel will be taken thereafter to determine the factual background of Plaintiff's employment and eventual termination.
- 

- b. What changes should be made, if any, in the limitations on discovery imposed under the Federal Rules of Civil Procedure or the local rules of this Court?

N/A

---

- c. The case presents the following issues relating to the disclosure of **electronically stored information**, including the form or forms in which it should be produced:

Not that the parties are aware of.

---

- d. The case presents the following issues relating to claims of **privilege or of protection as trial preparation materials**:

The Parties are uncertain as to whether a Protective Order will be necessary but commit to working together to jointly negotiate an Order if it becomes necessary.

---

Have the parties agreed on a procedure to assert such claims **AFTER** production?

☒ No

☐ Yes

☐ Yes, and the parties ask that the Court include their agreement in an Order.

- e. Identify the discovery, if any, that can be **deferred** pending settlement discussions and/or resolution of potentially dispositive motions: The Parties request that, to the extent that a Party retains an expert on damages, that discovery regarding the opinions of the expert occur after the resolution of dispositive motions.
- 

- f. The parties recommend that discovery should proceed in **phases**, as follows: Written discovery and document exchange to be followed by depositions.
- 

- g. Describe the areas in which expert testimony is expected and indicate whether each expert will be specially retained within the meaning of F.R.Civ.P. 26(a)(2): Plaintiff and Defendant may retain a damages expert.
- 

- h. Recommended discovery completion date: October 1, 2013
-

7. **Dispositive Motion(s)**

a. Recommended date for filing dispositive motions: November 8, 2013

8. **Settlement Discussions**

a. Has a settlement demand been made? Yes A response? Yes

b. Date by which a settlement demand can be made: NA

c. Date by which a response can be made: NA

9. The earliest Settlement Week referral reasonably likely to be productive is the  
(choose one)

       March 20       Settlement Week.

  X   June 2013 Settlement Week.

       September 20       Settlement Week.

       December 20       Settlement Week.

10. Other matters for the attention of the Court: NA

---

Signatures:

Attorney(s) for Plaintiff(s)

Attorney(s) for Defendant(s):

/s/ Ronald E. Seibel  
Ohio Bar # 0077296  
Trial Attorney for Plaintiff

s/ Kathryn S. Wood  
*Pro Hac Vice*  
Trail Attorney for Defendant